

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Aaron Murphy, )  
)  
*Plaintiff,* )  
) No. 3:20-cv-00969JPG  
-vs- )  
)  
Wexford Health Sources, Inc., )  
)  
*Defendant.* )

**PLAINTIFF'S MOTIONS IN LIMINE**

Plaintiffs move the Court in limine as follows:

1. To bar evidence of plaintiff's prior convictions and the nature of those convictions. Plaintiff has two felony convictions: a 2015 residential burglary case for which he was incarcerated at the time of the events at issue in this case, and a 2010 drug case. The jury will know that plaintiff was serving time in prison for committing a crime, but the probative value of the nature of the 2015 case is far outweighed by its prejudicial effect. The same is true for the 2010 drug case.
2. To bar defendants from introducing any undisclosed evidence or witnesses.
3. To bar any undisclosed opinion testimony.

Respectfully submitted,  
/s/ Kenneth N. Flaxman  
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